

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Smith Enterprise, Inc.,

Plaintiff,

vs.

Jason Edward Hammonds,

Defendant.

No. 2:13-cv-01773-GMS

**DECLARATION OF JASON EDWARD
HAMMONDS**

Jason Edward Hammonds does hereby declare pursuant to 28 U.S.C. § 1746:

1. I submit this declaration in support of my Motion for Sanctions Pursuant to Fed. R. Civ. P. 11(c). This declaration is based upon my personal knowledge.

2. I am a resident of Georgia and have resided in that State for the past seven years.

3. I am currently employed as an Assistant Professor of infectious diseases by the Department of Pediatrics at Emory University's School of Medicine. I work approximately 55 hours per week as a virologist and molecular biologist focusing on HIV-1 pathogenesis research.

4. Prior to Emory University, I was a graduate student and post-doctoral fellow at Vanderbilt University School of Medicine. At Vanderbilt, my work again focused on HIV-1 research.

5. In total, my research record dates back approximately 20 years, and during this time I have been published in several medical/scientific journals and periodicals.

1 6. I do not now, nor have I ever, held a federal firearms license to
2 manufacturer firearms and/or firearms components. Similarly, I do not now, nor have I
3 ever, manufactured or even participated in the manufacture of firearms and/or firearms
4 components.
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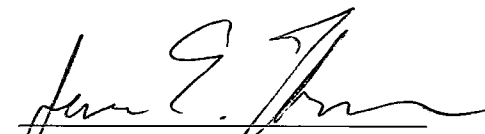
6 7. With respect to the M14 receivers that are at issue in this action, it is my
7 understanding that there are a handful of manufacturers (each well known in the industry)
8 that are known to manufacture such parts. I have no business and/or personal affiliation
9 with any of these companies.
10

11 8. Even if I had a federal firearms license, I simply lack the time, knowledge,
12 and resources to participate in the firearms manufacturing business. It is my
13 understanding that doing so requires a significant investment of capital, specialized
14 knowledge, machinery, and a location to manufacture/assemble parts. I meet none of
15 these requirements.
16

17 9. Following the internet forum post at issue in this action, I spoke on the
18 telephone with Smith Enterprise's owner, Ron Smith. Mr. Smith was rude and directed
19 several profanities at me, but he acknowledged at the time that I had ordered Smith
20 Enterprise M14 receivers and was a customer of the company (until such time as Crocs
21 Gunshop unilaterally cancelled my order). In my subsequent conversation with Smith
22 Enterprise's attorneys (prior to the filing of this lawsuit), we likewise discussed the fact
23 that I was a customer of Smith Enterprise's products (not a competitor as alleged by the
24 Complaint).
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1 I declare under penalty of perjury that the foregoing is true and correct.

2
3 Dated: September 17, 2013

4 
5 Jason Edward Hammonds

6 ACTIVE: 5019071_1